

88
GENERAL ELECTRIC COMPANY
SWITCHGEAR OPERATIONS

AUGUST 17, 1992

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101
ATTEN: DON LININGER/RCRA IOWA

ELECTRICAL DISTRIBUTION AND CONTROL
510 AGENCY ROAD
P.O. BOX 488
W. BURLINGTON, IA 52655
319-753-8508

RECEIVED
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DEAR SIR:

IOWA SECTION

IN RESPONSE TO THE RCRA FACILITIES ASSESSMENT REPORT COMPLETED IN FEBRUARY OF 1992, PLEASE REVIEW THE FOLLOWING ITEMS AND WE WOULD REQUEST THESE CHANGES BE MADE FOR OUR FACILITY.

ITEM 1: IN THE INTRODUCTION THE EPA CONSULTANT HAS INCORRECTLY DESCRIBED THE RCRA CORRECTIVE ACTION PROGRAM. WE FEEL THAT STEP THREE SHOULD READ AS A CORRECTIVE MEASURES STUDY RATHER THAN "CORRECTIVE MEASURES." IN THE EVENT OF REQUIRED CORRECTIVE ACTIONS, WE WOULD LIKE THE OPPORTUNITY TO HAVE A STUDY DONE WHICH WOULD INCLUDE COST CONSIDERATIONS FOR VARIOUS ALTERNATIVES BEFORE CORRECTIVE MEASURES BE IMPOSED.

ITEM 2: SINCE OUR WITHDRAWAL FOR THE PART B PERMIT, WE FEEL THAT ANY CORRECTIVE ACTION THAT MAY ARISE FROM THIS ASSESSMENT BE DONE THROUGH A "CONSENT ORDER" BEFORE "PERMIT CONDITIONS" ARE ISSUED BY THE EPA.

ITEM 3: WE DO NOT FEEL THAT SWMU #6 IS CORRECTLY IDENTIFIED. THE DEGREASER STILL IS A GENERATION UNIT AND NOT A STAND ALONE SWMU. THE STILL IS AN INTEGRAL PART OF THE TOTAL UNIT. WE DO HAVE AN AIR PERMIT THAT REGULATES THE UNIT AND WOULD LIKE CONSIDERATION TO CHANGE THIS DESIGNATION FROM A SWMU TO AN "AREA OF CONCERN."

ITEM 4: AS IN ITEM 3 (DEGREASER STILL) WE WOULD LIKE FOR SWMU 7 (WET SCRUBBERS) TO ALSO BE RECLASSIFIED FROM A SWMU TO AN AOC BECAUSE THIS IS LIKewise COVERED BY AN AIR PERMIT AND WAS ALSO STATED IN THE RFA TO BE OF A LOW POTENTIAL FOR RELEASE.

ITEM 5: SWMU 4 (WASTE WATER TREATMENT PLANT UNDERGROUND PROCESS TANKS) SOIL SAMPLES TAKEN BY THE EPA HAVE SHOWN SUBSTANTIALLY LOWER LEVELS OF HAZARDOUS METALS THAN WAS REPORTED BY GE DURING THE ACTUAL TANK REMOVAL. BOTH SAMPLES SHOW LEVELS BELOW ANY EPA DEFINED ACTION LEVELS. WE FEEL THIS SHOWS WE DO NOT HAVE A SOIL CONTAMINATION PROBLEM AND DO NOT FEEL THAT THERE SHOULD BE ANY FURTHER INVESTIGATION AND/OR CLEAN-UP COSTS ASSOCIATED WITH THIS SWMU. AS THERE WAS MENTIONED AN ISSUE OF "FUGITIVE (DUST) EMISSIONS FROM THIS UNIT AREA GE HAS SUBSEQUENTLY PLANTED GRASS OVER THE ENTIRE AREA. THE FINAL POINT IN THIS ITEM IS THAT TANK #6 WAS INCORRECTLY IDENTIFIED AS BEING A PART OF THIS SWMU. EPA DOCUMENTATION ON PAGE 29 DOES NOT IDENTIFY TANK #6 AS HOLDING HAZARDOUS WASTE.

ITEM 6: CONCERNING AOC-A (THE E-COAT DIP TANK), THE UNIT DOES USE PAINTS THAT GENERATE LEAD CONTAINING WASTE. THE RFA DOES NOT ASSESS A RELEASE POTENTIAL FROM THIS UNIT AND DUE TO THE TECHNOLOGY OF THIS UNIT WE DO NOT FEEL IT SHOULD BE CLASSIFIED AS AN AREA OF CONCERN. THIS UNIT IS ALSO COVERED BY AN AIR PERMIT WHICH ALLOWS FOR A RELEASE OF 8 TONS OF ETHYLENE GLYCOL MONOBUTYL ETHER.



R00324014
RCRA RECORDS CENTER

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ITEM 7: SEVERAL SAMPLING DISCREPANCIES HAVE BEEN NOTICED AND WE WOULD LIKE TO BRING THEM TO YOUR ATTENTION AS THEY MAY LEAD THE READER OF THE RFA INTO ASSUMING HAZARDOUS WASTE POTENTIALS WHERE NONE EXIST.

a. THE LEVELS OF VARIOUS HAZARDOUS METALS IN THE SEDIMENT AT AOC-B (STORM SEWER DISCHARGE) DID NOT EXCEED ACTION LEVELS FOR SOILS WHEN SAMPLED IN EITHER 1980 OR 1991. THE CONCENTRATIONS IN THE WATER AT THE TIME OF THE 1991 SAMPLING DID NOT EXCEED THE MCLs FOR DRINKING WATER. WE WOULD ALSO LIKE TO SAY THAT THE 1992 SAMPLES DID SHOW A LOWER MAGNITUDE OF ORDER THAN IN 1980 WHICH SHOWS THERE IS NOT A CONTINUING SOURCE OF RELEASE.

b. DUE TO THE SAMPLING LOCATION (ONE-HALF MILE FROM THE GE FACILITY), WE DO NOT FEEL THIS IS AN ACCURATE REPRESENTATION FOR GE. THE SEWER LINE TRAVELS ALONG AN INDUSTRIAL ROAD AND THROUGH AN INDUSTRIAL AREA BEFORE IT DISCHARGES TO THE AOC. THE SAMPLING TAKEN BY THE EPA OFFICE FROM 1980 AND 1991 DO NOT AGREE IN LOCATION OR WRITTEN DESCRIPTIONS. WE WOULD LIKE TO POINT THIS OUT BECAUSE WE DO NOT FEEL THIS ACCURATELY PORTRAYS THE STORM WATER GE DISCHARGES AND ANY CONNECTION BETWEEN GE AND METALS CONTAINING SEDIMENT MAY BE ONLY COINCIDENTAL.

c. WE ALSO WOULD LIKE TO EXPRESS OUR CONCERN THAT WE FEEL THERE MAY HAVE BEEN A LACK OF PROPER BACKGROUND SAMPLING, PROTOCOLS DIFFERED BETWEEN GE AND THE EPA, WE DO NOT FEEL WIPE SAMPLES ARE VALID DETERMINATES OF A RELEASE TO THE SOIL, THAT THE HONEY CREEK WATER IS NOT A VALID REPRESENTATION OF STORM WATER LEAVING GE'S FACILITY, AND THE GUIDELINES CITED IN THE SAP/QAPP WERE NOT CURRENT AT THE TIME THIS DOCUMENT WAS PREPARED.

TECHNICAL ITEMS:

ITEM 8: ON PAGE 5 PARAGRAPH 2 IT SHOULD READ THAT THE "PRIME COAT IS AN ELECTROPHORETIC PAINT" AND NOT A ELECTROSTATIC PAINT.

ITEM 9: THE E-COAT AIR PERMIT IS FOR ETHYLENE GLYCOL MONOBUTYL ETHER AND NOT ETHYLMONOBUTYL ETHER. (PAGE 33, SECTION 5.1)

ITEM 10: THE E-COAT PAINT IS CLASSIFIED AS D001 (IGNITABLE). THE PAINT FILTERS FROM THE DIP COAT SECTION ARE CLASSIFIED AS D008 (LEAD).

ITEM 11: THE MASKING TAPE/OVERSPRAY MATERIALS HAVE BEEN RETESTED BY TCLP AND FOUND TO BE NON-HAZARDOUS. THE FILTERS FROM THE FINAL PAINT BOOTH ARE CLASSIFIED AS D001 (IGNITABLE). (TABLE 1).

ITEM 12: SAFETY-KLEEN (ONE OF OUR HAZARDOUS WASTE DISPOSAL COMPANIES) IS CONTRACTED TO DISPOSE OF SEVERAL OF OUR WASTES. AT PRESENT THEY TAKE FOR RECLAMATION PURPOSES THE F001 FROM THE DEGREASER AND F002 FROM THE VIPO AREA. AT THE TIME THIS REPORT WAS WRITTEN THEY ALSO WERE TAKING OUR FINAL AND E-COAT WASTE SOLID AND LIQUID. THE SOLID WASTE WAS DISPOSED OF BY INCINERATION (THE FILTERS) AND THE LIQUID WASTE BY FUEL BLENDING.

ITEM 13: TABLE 1 SHOWS E-COAT PAINT SLUDGE TO CONTAIN LEAD AND THE FILTERS DO NOT. BY EP-TOX THE PRIMARY WASTE CODE FOR E-COAT SLUDGE IS D001 FOR IGNITABILITY, AND THE FILTERS SHOW BY TCLP, D008 FOR LEAD.

ITEM 14: WE WOULD LIKE TO REFER TO THE FINAL PAINT AREA AS USING "ACRYLIC LACQUERS." ALTHOUGH WE UNDERSTAND THAT ACRYLIC LACQUER PAINT IS A COMMON TERM THAT IS USED, ACRYLIC LACQUER BEST DESCRIBES OUR COATING.

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ITEM 15: THE RFA REPORT (PAGE 8, PARAGRAPH 5 AND TABLE 1) DESCRIBES THE SPENT SOLVENT FROM THE PARTS WASHERS AS IGNITABLE (D001), TO CONTAIN LEAD (D008) AND AS BEING TETRACHLOROETHYLENE (D039). BY OUTSIDE CONTRACTOR THE TCLP FOR THE PARTS WASHER MATERIAL CONTAINS NO D039.

ITEM 16: ON PAGE 5, LAST PARAGRAPH, TABLE 1 IT HAS BEEN IDENTIFIED THAT SPENT THINNERS ARE F003 AND F005. AS THIS MATERIAL IS MIXED IN WITH THE EXISTING F003 FINAL PAINT LIQUID WASTE, THERE IS NO SEPARATE AND DISTINCT WASTE STREAM GENERATED FOR THIS PRODUCT. THEREFORE, THE F003 CODE IS USED FOR THE COMBINED WASTE PRODUCT.

WE FEEL THESE ISSUES SHOULD BE REVIEWED AND ADDED TO OUR EXISTING FILE AS PERMANENT ADDENDUM OR THE RFA OPENED TO REFLECT THESE CHANGES IN THE BODY OF THE TEXT. WE APPRECIATE YOUR TIME IN REVIEWING THESE LISTED ITEMS AND LOOK FORWARD TO YOUR RESPONSE. YOU MAY REACH ME AT 319-753-8508, FROM 8:00 AM TO 4:30 PM MONDAY THROUGH FRIDAY.

SINCERELY,

Beth McBee

BETH MCBEE
MANAGER, SAFETY AND ENVIRONMENTAL PROGRAMS